

REPLY TO ATTENTION OF

DEPARTMENT OF THE ARMY NEW ENGLAND DIVISION, CORPS OF ENGINEERS 424 TRAPELO ROAD

WALTHAM, MASSACHUSETTS 02254-9149

January 17, 1997

North Central Resident Office Fort Devens, Massachusetts

Mr. Robert Martinack Massachusetts DEP 10 Commerce Way Woburn, MA 01801 RCRA REGITAS CENTER
FACILITY SHIMY COP & Engineer
LD. NO. MAROODO TETO
OTHER

Dear Mr. Martinack:

I am writing this letter to clear up some confusion regarding a Hazardous Waste Generator Compliance Bill that I received last month. The bill categorizes the Army Corps of Engineers as a large quantity generator, is for \$1,800.00, and a copy is attached to this letter.

The bill is a result of a project that the Army Corps was managing last year at Building 108 of the Charlestown Navy Yard. The project was mainly an asbestos removal project, but in one area of the building we found a large quantity of lead paint chips mixed in with asbestos containing material. As a result of this problem, we had to ship 200 fifty-five gallon drums of lead waste off the site using hazardous waste manifests. On the original manifests our contractor used the Army Corps' phone number as the US EPA ID No. because this would be a one time shipment from this site. The material went to Model City Landfill in New York State. Three truckloads of drums were sent, and copies of all three manifests are attached to this letter. These shipments were all made in January of 1996.

A few weeks later I received a phone call from Beth McDonough of the Mass DEP regarding a problem with my EPA ID No. She said that the use of a phone number as an ID number is normally ok, but because of an interstate agreement (or disagreement) with New York, I would have to retroactively get an EPA ID No. and apply it to my site. She also told me to send her a letter to inactivate the ID No. once the problem was cleared up. At this point I filled out the application form - copy attached, got my EPA ID No. (MAR000006767), but then neglected to inactivate the number upon completion of our work on site. Our contractor finished demobilization from the site in June of 1996.

Based on my conversation with you earlier this week, I should not have received this bill if I had properly deactivated my EPA ID No. Therefore, I am now requesting to have the EPA



ID No. deactivated as of June 1996, to have my \$1,800.00 bill deleted. If you need any more information, or have any questions regarding this problem, please call me at (508) 772-0148 or 772-0159. Thank you.

Sincerely,

Stephen J. Umbrell Project Engineer

U.S. Army Corps of Engineers

Enclosures: Compliance Bill ID No. Application Lead Waste Manifests ID No. acknowledgement The slock for revenued as at large 1996 and a company to MHU, or the first of the first state of the first s

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Bill to: US ARMY CORPS OF ENGINEERS	1,800.00						

CHARLESTOWN NAVY YARD BLDG 108 FORT DEVENS PO BOX 90 AYER MA 01433

Please check if address has changed. Write correct address on back of stub and enclose with payment.

Please detach the above stub and return with your remittance payable to: COMMONWEALTH OF MASSACHUSETTS

The Commonwealth of Massachusetts DEPT ENVIRONMENTAL PROTECTION

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